

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

**RAUL NOVOA, JAIME CAMPOS
FUENTES, ABDIAZIZ KARIM, and
RAMON MANCIA**, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

Civil Action No. 5:17-cv-02514-JGB-SHKx

**DECLARATION OF TINA
WOLFSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

I, Tina Wolfson, declare as follows:

1. I am an attorney duly licensed to practice before all courts of the State of California as well as other state and federal courts. I am a founding member of the law firm Ahdoot & Wolfson, PC ("AW"), founded in 1998, and I have litigated complex consumer class actions for two decades. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify regarding those matters. I submit this Declaration in support of Plaintiffs' Motion for Class Certification.

2. Attached as **Exhibit 1** is a true and correct copy of my firm's resume, which includes my curriculum vitae.

3. As indicated by my firm's resume, I have extensive experience in prosecuting complex class actions. I have served as plaintiffs' counsel/co-counsel or class counsel and litigated numerous class actions or representative actions against large corporate defendants involving varied consumer and employee rights claims. I have

1 extensive experience in leadership roles prosecuting consumer class actions, including
2 consolidated multidistrict litigation.

3 4. AW is experienced in litigating complex consumer and employment class
4 actions. AW has been appointed lead counsel in numerous class actions, and the AW
5 attorneys who worked on this case are well qualified to serve as Class Counsel in this
6 action.

7 5. AW is ready and able to commit our time, energy, and focus to this
8 litigation. We have sufficient staff and financial resources to zealously pursue Plaintiff's
9 and the putative class's claims. AW and our co-counsel are committed to advancing the
10 costs of the litigation.

11
12 I declare under penalty of perjury that the foregoing is true and correct. Executed
13 this 16th day of September, 2019, at Los Angeles, California.

14
15 

16 _____
17 Tina Wolfson
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EXHIBIT 1



AHDOOT & WOLFSON, PC

ATTORNEYS



Tina Wolfson, Founding Partner

Ms. Wolfson was born in the former Soviet Union and her family escaped when she was eleven. Seven years after her family arrived to the United States as indigent political refugees, without speaking any English, she attended Columbia College and then Harvard Law School, graduating both *cum laude*. Ms. Wolfson began her civil litigation career at the Los Angeles office of Morrison & Foerster, LLP, where she defended major corporations in complex actions and represented indigent individuals in immigration and deportation trials as part of the firm's *pro bono* practice. She then gained further invaluable litigation and trial experience at a boutique firm, focusing on representing plaintiffs on a contingency basis in civil rights and employee rights cases.

Ms. Wolfson and Robert Ahdoot founded Ahdoot & Wolfson (“AW”) in 1998. Twenty years later, AW is one of the most respected, nationally recognized plaintiffs’ firms, with a focus on consumer, employee, and civil rights. AW has been appointed lead class counsel in numerous class actions, including Multidistrict Litigation, and its advocacy has resulted in hundreds of millions of dollars awarded to victims of corporate and governmental wrongdoing, as well as major changes in corporate and governmental behavior in the form of injunctive relief.

For example, in *Eck v. City of Los Angeles*, No. BC577028 (LASC), as class co-lead counsel, AW achieved a \$295 million finally-approved settlement arising from the City’s alleged violations of California’s Propositions 218 and 26 pertaining to allegedly unlawful surcharges in power utility billing.

In *Kirby v. McAfee, Inc.*, No. 14-cv-02475-EJD (N.D. Cal.), AW, as class co-lead counsel in a case arising from McAfee’s auto renewal and discount practices, reached a settlement that made \$80 million available to the class and required McAfee to notify customers regarding auto-renewals at an undiscounted subscription price and change its policy regarding the past pricing it lists as a reference to any current discount.

As court-appointed co-lead counsel in the *Experian Data Breach Litigation*, No. 8:15-cv-1592-AG-DFM (C.D. Cal.), (Hon. Andrew J. Guilford), which affected nearly 16 million class members, Ms. Wolfson achieved the preliminarily-approved settlement conservatively valued at over \$47 Million. Each class member is entitled to two years of additional premium credit monitoring and ID theft insurance (to begin whenever their current credit monitoring product, if any, expires) plus monetary relief (in the form of either documented losses or a default payment for non-documented claims). Experian is also providing robust injunctive relief.

In the *Lumber Liquidators Chinese-Manufactured Flooring Durability Mktg. & Sales Practices Litig.*, No. 1:16-md-02743-AJT-TRJ (E.D. Va.), arising from alleged misrepresentations of laminate flooring durability, which is coordinated with MDL proceedings regarding formaldehyde emissions, AW as class counsel achieved a finally-approved \$36 million settlement.

In *McKnight v. Uber Techs., Inc.*, No. 3:14-cv-05615-JST (N.D. Cal.), AW is serving as plaintiffs' counsel arising from "safe ride" fees charged to Uber customers, in which a settlement for \$32.5 million is pending final approval.

In *The Home Depot, Inc., Customer Data Sec. Breach Litig.*, No. 1:14-md-2583-TWT (N.D. Ga.), as a member of the PSC, Ms. Wolfson achieved a \$29 million settlement fund and robust injunctive relief to the consumer class.

In *Pantehyat v. Bank of Am., N.A.*, No. 1:16-cv-08964-AJN (S.D.N.Y.), a class action arising from allegedly improper overdraft fees, AW achieved a preliminarily approval of a \$22 million class settlement, representing approximately 80% of total revenues gleaned by the bank's alleged conduct.

In *Smith v. Floor & Decor Outlets of Am., Inc.*, No. 1:15-cv-04316-ELR (N.D. Ga.), AW served as plaintiffs' counsel for a \$14 million class settlement arising from alleged toxic emissions from flooring.

In *Chimeno-Buzzi v. Hollister Co.*, No. 1:14-cv-23120-MGC (S.D. Fla.), AW achieved a \$10 million non-reversionary fund and significant injunctive relief settlement for alleged violations of the Telephone Consumer Protection Act of 1991 ("TCPA").

Ms. Wolfson and AW's success as class counsel in many other matters has conferred millions of dollars in benefits and injunctive relief to the class. *dSkeen v. BMW of N. Am., LLC*, No. 2:13-cv-01531-WHW-CLW (D.N.J.) (arising from MINI Coopers with allegedly defective timing chain; uncapped settlement fund for warranty extension, reimbursement for repairs, and compensation for sale at a loss); *In re: Uber FCRA Litig.*, No. 3:14-cv-05200-EMC (N.D. Cal.) (\$7.5 million settlement, including injunctive relief guaranteeing Uber's compliance with FCRA background check requirements); *Cassidy v. Reebok International Ltd.*, No. 2:10-cv-09966-AHM (C.D. Cal.) (\$25 million nationwide settlement of apparel false advertising case); *Carey v. New Balance Athletic Shoe, Inc.*, Nos. 1:11-cv-10632-LTS & 1:11-cv-10001-LTS (D. Mass.) (\$3.7 million nationwide settlement of apparel false advertising case); *Pappas v. Naked Juice Co. of Glendora, Inc.*, No. 2:11-cv-8276-JAK-PLA (C.D. Cal.) (\$9 million nationwide settlement, with injunctive relief in the form of product labeling changes, and periodic audits to assure compliance with labeling representations); *Trammell v. Barbara's Bakery, Inc.*, No. 3:12-cv-02664-CRB (N.D. Cal.) (\$4 million nationwide settlement of food false advertising case); *West v. ExamSoft Worldwide Inc.*, No. 14-cv-22950-UU (S.D. Fla.) (\$2 million nationwide settlement arising from bar exam software error).

Ms. Wolfson is currently serving on the Plaintiffs' Executive Committee in the *Apple Inc. Device Performance Litig.*, No. 5:18-md-2827-EJD (N.D. Cal.), arising from Apple's alleged iPhone throttling practices affecting device performance and battery life; on the Plaintiffs' Executive Leadership Committee in the *Premiera Blue Cross Customer Data Sec. Breach Litig.*, No. 3:15-cv-2633-SI (D. Or.), arising from a data breach disclosing the sensitive personal and medical information of 11 million Premiera Blue Cross members; and on the Plaintiffs' Steering Committee in the *U.S. Office of Pers. Mgmt. Data Sec. Breach Litig.*, No. 1:15-mc-01394-ABJ (D.D.C.), (the court's order of dismissal is on appeal to the D.C. Circuit). She also is prosecuting consumers' rights to control the collection and use of biometric information in *Rivera v. Google, Inc.*, No. 1:16-cv-02714 (N.D. Ill.) and *Monroy v. Shutterfly, Inc.*, No. 1:16-cv-10984 (N.D. Ill.). In *Williams v. City of New York*, No. 1:17-cv-2303-RJD-SMG (E.D.N.Y.), Ms. Wolfson is prosecuting the City of New York's Department of Correction for its alleged failure to adequately monitor and supervise inmates to prevent violence and serious injuries.

Ms. Wolfson frequently lectures on numerous class action topics across the country. Her notable speaking engagements include: Class Action Mastery Forum at the University Of San Diego School of Law (Data Breach/Privacy Class Action Panel) January 16, 2019; Association of Business Trial Lawyers: “Navigating Class Action Settlement Negotiations and Court Approval: A Discussion with the Experts,” Los Angeles May 2017, featuring Hon. Philip S. Gutierrez and Hon. Jay C. Gandhi; CalBar Privacy Panel: “Privacy Law Symposium: Insider Views on Emerging Trends in Privacy Law Litigation and Enforcement Actions in California,” Los Angeles Mar. 2017 (Moderator), featuring Hon. Kim Dunning; Federal Bar Association: N.D. Cal. Chapter “2016 Class Action Symposium,” San Francisco Dec. 2016 (Co-Chair), featuring Hon. Joseph F. Anderson, Jr. and Hon. Susan Y. Illston; Federal Bar Association: “The Future of Class Actions: Cutting Edge Topics in Class Action Litigation,” San Francisco Nov. 2015 (Co-Chair & Faculty), featuring Hon. Jon S. Tigar and Hon. Laurel Beeler.

Ms. Wolfson currently serves as Lawyer Representative for the Ninth Circuit (Central District of California), on the Federal Litigation Section of the Federal Bar Association, and on the board of Public Justice.